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## MEMORANDUM

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**TO:** Karen Dinicola, Department of Ecology, Water Quality Program  
**FROM:** Wenatchee Valley Stormwater Technical Advisory Committee  
**SUBJECT:** Comments on the Formal Draft of the Eastern WA NPDES Phase II Municipal Permit  
**DATE:** 6/22/2006

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The Wenatchee Valley Stormwater Technical Advisory Committee, which is comprised of representatives from Chelan County, Douglas County, City of East Wenatchee and City of Wenatchee, respectfully submits the following comments on the formal draft of the Eastern Washington NPDES Phase II Municipal permit and fact sheet. Thank you in advance for your consideration of our comments.

For the permit we have the following comments:

1. Page 5; S2.C; line 33: This should be rephrased. Fire fighting activities will not pause during an emergency call to determine if pollutants are entering waters of the State.
2. Page 10; S5.3a.ii; line 17: Define priority water bodies.
3. Page 11; S5.3.iv; line 23: It is requested that the word "reduced" be changed to "address."
4. Page 11; S5.3.iv; line 17: Define hyperchlorination.
5. Page 11; S5.3.iv; line 26-31: States "The discharges shall be dechlorinated to a concentration of 0.1 ppm or less, pH adjusted if necessary, reoxygenated, and volumetrically and velocity controlled to prevent resuspension of sediments." needs to be rewritten for private homeowners who own pools to understand and can follow.
6. Page 11; S5.3b.iv; line 38-39: The Clean Air Act calls for limiting fugitive dust emitted into the atmosphere. The suggestion that "At active construction sites, street sweeping must be performed prior to washing the streets." contradicts what is discussed in this Act. By not being able to water down an area that is to be swept will increase the opportunity for dust to travel offsite and affect surrounding properties. Also to be considered, fugitive dust is a health issue to a percentage of people in any area work is being

conducted in. For example fugitive dust can impact people with asthma or weak immune systems.

7. Page 14; 4; line 3: Make sure the Construction Site Stormwater Runoff Control in this NPDES is consistent with the Construction Stormwater General Permit.
8. Page 30; G9; line 11: Add a note stating that this section is applicable only where analytical monitoring is required.
9. Page 32; S8; line 24: states that jurisdictions “shall prepare to participate in...monitoring program.” This section continues on to require a full blown monitoring plan tied into an adaptive management process, which sounds similar to a TMDL plan process which takes years of field surveys, public involvement, and significant staff time to develop. To compile the information required within this section is not only outside the intent of the federal regulation, but will take local jurisdictions a substantial effort to meet compliance. The resources of local jurisdictions are already spread thin in an attempt to comply with the required sections of this permit.

We have the following comments for the NPDES Fact Sheet.

1. If possible, summarize sections or eliminate any unnecessary text. For example provide appendices for; what entities are covered under this permit, which are exempt, and reasons why, legal discussions, and tables. Making the fact sheet a more “reader friendly” document (a process that WSDOT has begun to do) might limit the volume of phone calls that will have to be answered by Ecology and local agencies from citizens trying to understand this permit.
2. We understand that Ecology updated this version of the draft fact sheet “substantially compared with the preliminary draft version”, however the reiteration of statements similar to this one throughout the fact sheet is unnecessary. Elimination of all references to how Ecology “...added to the permit...” would simplify the document (for example, page 30, second paragraph; page 31; first paragraph, last sentence; page 30, second, third, and forth paragraphs; page 32, seventh paragraph; page 33, sixth paragraph; etc.). If people are interested they can compare the preliminary draft and the current draft to see what changes Ecology has made.
3. Similar to Comment 2, do not discuss previous versions of the draft. Keep to the facts and only discuss what this current draft has to offer.
4. Page 20; S2.A.3; last sentence: Define underground waters.
5. Page 30; S5.B.3 and S5.B.3.b; Emergency should be placed in front of fire fighting activities to be consistent with the NPDES permit. If emergency is not inserted, what sort of fire fighting activities are included or excluded?
6. Page 32; S5.B.4; last paragraph; second sentence: States “This requirement is limited to projects which disturb one acre or more.” *and is connected to waters of the State* should be added to the end of this sentence.